
TABLE OF CONTENTS

	PAGE
NATURE AND STAGE OF PROCEEDINGS.....	1
ARGUMENT.....	2
I. RECENTLY DEPOSED NEW CASTLE COUNTY POLICE OFFICERS CONFIRM THAT THE ASHLAND DEFENDANTS HAD A DUTY TO KEEP THE SUBJECT DOORS CLOSED IN ORDER TO KEEP YOUNG CHILDREN FROM ACCESSING THE POOL AREA.....	2
II. PLAINTIFF'S CONSTRUCTION EXPERT OPINES THAT THE ASHLAND DEFENDANTS HAD CONTROL OF THE INGRESS/EGRESS TO THE INDOOR POOL THEREBY CREATING A GENUINE ISSUE OF MATERIAL FACT.....	6
III. CONCLUSION.....	8